



April 11, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band, GN Docket No. 18-122
Ex Parte Letter

Dear Ms. Dortch:

LinkUp Communications Corporation (“LinkUp”) writes to express its support for the Market-Based Approach proposed by the C-Band Alliance (“CBA”) to repurpose 200 MHz of C-band spectrum (inclusive of a 20 MHz guard band) for flexible use. Of the various proposals in the record, the Market-Based Approach is the clear choice.

The CBA has thoroughly explained why repurposing 200 MHz is a sound approach. It will ensure that current satellite customers, like the many non-profit broadcast ministries that we at LinkUp serve with satellite services, can continue utilizing the C-band to distribute radio content to American listeners nationwide.¹ Moreover, CBA members have committed publicly to launching new satellites to ensure that they have the same capacity to carry video, audio and other services in 300 MHz of spectrum that they have today in 500 MHz.² As a result, under the Market-Based Approach, LinkUp’s ministry customers and other current C-band users will continue to be served in the C-band spectrum, which is uniquely situated for nationwide content distribution. No other plan explains how programmers and broadcasters that continue to rely on C-band spectrum today and in the future would continue to reach 90 percent of Americans over age 12 who listen to AM/FM radio at least once a week. And no other plan has offered details regarding technical rules needed to ensure that earth stations receiving in C-band will be protected from terrestrial mobile interference should some spectrum be repurposed for flexible use as proposed by the FCC.

¹ Examples of LinkUp’s ministry customers include: Educational Media Foundation, Rocklin CA, WAYFM Media Group, Colorado Springs, CO, Moody Bible Institute of Chicago, IL, Faith Broadcasting, Montgomery, AL, Augusta Christian Fellowship, Augusta, GA .

² See, e.g., Letter from Jennifer D. Hindin, Counsel for the C-Band Alliance (Feb. 7, 2019) (“CBA *Ex Parte* Letter”).

Some parties have suggested that there is a path to clearing more than 200 MHz of spectrum by moving content distribution to alternative frequency bands or to fiber. But the record in this proceeding is unequivocal—fiber is not an adequate substitute for C-band content distribution.³ Current fiber deployments are not nearly extensive enough to replace nationwide C-band coverage. Also, fiber lacks the C-band’s reliability and resiliency. Many of these downlink and broadcast locations are remote AM/FM transmitter sites where high-speed internet or 4G cellular coverage often will not reach. Even where fiber is available, it is vastly more expensive than the C-band satellite service. Moreover, building fiber out with the redundancy that is required for video and audio programming distribution is a decades-long process. For non-profit broadcast ministries such as the customers served by LinkUp, this is a completely unimaginable expense.

Switching to Ku-band is not an effective option. Ku-band does not provide the quality and reliability that LinkUp’s ministry customers and their listeners require. For this reason alone, several ministries we serve over the last five years have invested millions of dollars in converting from less reliable Ku-band systems to the more reliable Cband uplinks and downlinks. They did this specifically, to better serve their communities.

LinkUp agrees that repurposing more than 200 MHz would certainly result in loss of C-band service for at least some existing satellite customers.⁴ We believe that this action could have a disproportionate impact on the non-profit radio ministries who reach American listeners in all 50 states and Puerto Rico. Indeed, the CBA notes that to clear even 200 MHz without harming existing customers, several new satellites must be built and launched. LinkUp believes that only the CBA and the Market-Based Approach can deliver on these additional satellites. LinkUp also believes that only the CBA can successfully handle the transition of existing C-band services to a 300-MHz satellite environment. It is extremely disappointing and worrisome to us that other proposals on the record make no realistic provision for protection of current users of C-band spectrum. For this reason, LinkUp believes those other proposals must be rejected.

To the extent that the FCC decides that C-band spectrum must be repurposed, LinkUp believes that only 200 MHz should be repurposed and that only one proposal under consideration by the FCC will protect incumbent C-band customers while repurposing that amount of spectrum. LinkUp therefore enthusiastically endorses the CBA’s Market-Based Approach and urges the Commission to adopt it.

Respectfully submitted,



³ See, e.g., Comments of Comcast Corporation and NBCUniversal Media, LLC, GN Docket No. 18-122, at 18 (Oct. 29, 2018); Comments of the C-Band Alliance, GN Docket No. 18-122, at 11 (Oct. 29, 2018); Reply Comments of the Content Companies, GN Docket No. 18-122, at 4 (Dec. 11, 2018); Comments of Cumulus Media Inc. and Westwood One, LLC, GN Docket No. 18-122, at 5 (Oct. 29, 2018); Comments of GCI Communication Corp., GN Docket No. 18-122, at 12 (Oct. 29, 2018).

⁴ See, e.g., CBA *Ex Parte* Letter.

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